

[Submitting Counsel on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE JUUL LABS, INC., MARKETING,
SALES PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

Case No. 19-md-02913-WHO

**STATUS REPORT ON SETTLEMENT
IMPLEMENTATION**

This Document Relates to:

ALL ACTIONS

Plaintiffs hereby provide an update on the government entity settlements, in accordance with the Court's request.

As previously indicated, the government entity settlements will provide significant funding to more than 1,500 government entities in 46 different states across the United States. The agreements with both JLI and Altria require the settlement funds to be used for "compensatory restitution or remediation," terms specifically chosen to outline the purpose and parameters of the settlement. The settlements are enabling government entities throughout the country to adopt tailored, community-focused approaches to youth vaping and addiction prevention, education, and cessation treatments. Below are examples of how the government entity settlement is funding solutions to the public health youth e-cigarette crisis.

A. Bellwether Government Entity Plaintiffs

1. San Francisco Unified School District, California

Bellwether Plaintiff San Francisco Unified School District ("SFUSD") developed a plan for settlement proceeds that will support student health for years to come. Pursuant to that plan, the settlement funds are being used to address student tobacco/vaping education and related student

1 health issues, which may include student mental, emotional, and social health. This includes
 2 working with community partners to provide on campus resources and access to community
 3 programs, implementing classroom-based education enabling students to make healthy choices,
 4 continuing health education at 13 middle schools, and funding wellness staff at 17 high schools.

5 For the current school year, SFUSD has used settlement proceeds to fund a total of 73
 6 positions at middle and high schools. The proceeds have, thus far, been primarily used to fund
 7 school counselors and nurses and community health outreach workers (CHOW) at high school and
 8 middle school wellness centers. Anti-vaping programs supported by CHOWs include SFUSD's
 9 Youth Outreach Workers, a program where SFUSD students raise awareness on health issues
 10 impacting students and seek to educate their peers on those issues. With support from CHOWs,
 11 SFUSD's Youth Outreach Workers hosted an Anti-Vaping and Anti-Tobacco Week. In addition,
 12 settlement proceeds have been used to fund three central office positions, two in the Office of
 13 Equity, and one in the Student & Family Services Division for a total of 76 positions.

14 **2. King County, Washington**

15 Bellwether King County, Washington ("King County") is dedicating settlement resources
 16 to addressing harms related to the vaping epidemic. King County's Public Health – Seattle & King
 17 County Cannabis, Commercial Tobacco, and Vapor Prevention Program (CCTV) is working on
 18 using the funding over ten or more years to make significant and sustainable changes in the
 19 landscape of nicotine and vapor product use. To support these goals, King County is adopting a
 20 comprehensive approach to combating nicotine use.

21 In 2025 King County's CCTV added an additional 15 community organizations to their
 22 Community Change Prevention Grant portfolio. These Grants provide funding and technical
 23 assistance to community organizations for two to four years to address risk and protective factors
 24 affecting nicotine and cannabis use and cessation. These grants elevate youth leadership and
 25 community expertise. As a result, King County has been able to reach new partners, such as
 26 organizations who serve East African and refugee communities. Before the settlement, King
 27 County was able to fund less than half of the applicants, including many that the review team scored
 28 highly. In 2025, the settlement monies allowed CCTV to hire and onboard three new program and

1 operations managers to facilitate the increased grantee workload and to manage the larger
2 community assessment project already underway.

3 To identify and enhance additional strategies, King County is conducting robust assessment
4 and community engagement that should conclude in mid-2026. As part of this work, settlement
5 funds will support robust surveillance assessment of youth nicotine use and enable dedication of
6 resources to invest to address the needs and leverage the resources that assessment work identifies.
7 King County has been making progress on multiple workstreams.

8 **Assessment infrastructure**

9 Since receiving the first installments of settlement funds, King County identified
10 epidemiological and social research scientist support for the assessment, hired an assessment
11 project manager, and developed an agreement from the Washington State Cancer Prevention
12 Research fund to match up to \$500,000 in funds to expand assessment work and reserve settlement
13 funds for implementation. In 2025 King County recruited a Community Advisory Board (CAB)
14 consisting of 12 members connected to a variety of communities and sectors. The CAB met four
15 times in 2025 and will continue to meet regularly in 2026 to help advise the assessment project and
16 decisions made around longer-term investment strategies. Upcoming in 2026, there will be
17 community forums scheduled to add more community input to the strategy selection process.

18 **Analysis of existing data**

19 In 2025 King County analyzed data from the Young Adult Health Survey, Healthy Youth
20 Survey, Behavioral Risk Factor Surveillance System, and Quitline data. Findings from these data
21 sources are being shared with the CAB and will be shared in upcoming community forums to help
22 provide a basis for investment strategy decisions to be made later in 2026.

23 **Community listening and data collection**

24 The County completed eight youth listening sessions and is currently analyzing the
25 qualitative data collected. The County is also halfway through 22 cessation interviews that are being
26 conducted via a network of community navigators. The County also has contracted with the Center
27 for the Study of Health & Risk Behaviors at the University of Washington School of Medicine to
28 conduct listening sessions with young adults ages 18-29 and these sessions will get underway in

the coming weeks. King County’s CCTV will then analyze these sessions, present the findings to the CAB and community forums to help gather input in the selection of prevention strategies that will begin to change the landscape of nicotine and vapor product use.

3. Tucson Unified School District, Arizona

Bellwether Plaintiff Tucson Unified School District (“TUSD”) has been continuing the work of the Task Force it formed shortly after the settlement. The Addiction Reduction Task Force, led by School Board President and community family physician Dr. Ravi Shah, is made up of experts in the community on addiction medicine, harm reduction, and prevention strategies, along with district leadership. The Addiction Reduction Task Force is charged with presenting to the TUSD Board evidence-based recommendations and best practices to support students with and at risk for addiction and related health issues and make recommendations on best uses of the settlement proceeds.

In the 2024- 2025 school year, TUSD hired a Program Manager, Program Coordinator, and five Community Health Workers to be placed at sites regionally. In July of 2025 the initiative was moved into student relations under the leadership of Anna Warmbrand, the Director of Student Relations. An implementation plan was developed and submitted to the school board on November 18, 2025. The following is the implementation plan for the remainder of the 2025-2026 school year and the school year 2026-2027: A tiered implementation plan was approved by the School Board which included Tier 1 prevention supports for students and intervention supports for Tier 2 and Tier 3 students. The district will utilize the curriculum purchased from Character Strong for Tier 1 and curriculum purchased from Thrive/Elevate for Tier 2 and 3. Counselors and support staff will be paid stipends to work with students needing Tier 2 interventions and the Community Health Workers will serve Tier 3 students who have had more than 10 days of exclusion due to substance abuse. The Student Relations department will continue to work with a community coalition and manage agreements with community partners to support students in TUSD with substance abuse and misuse.¹

¹ See also <https://www.kold.com/2023/11/22/task-force-aims-allocate-tusds-7-million-juul-settlement-funds/> and https://tucson.com/news/local/education/precollegiate/article_36cf9c1c-d47c-11ee-bdb8-37355d005ced.html.

1 **4. City of Rochester, New Hampshire**

2 Bellwether Plaintiff City of Rochester, New Hampshire (“Rochester”), which served as both
3 a municipal and a school bellwether, is continuing to use and/or earmark funds to combat youth
4 vaping in its schools and community in the following ways:

- 5 • Engaging a substance-use prevention speaker to present at the middle schools, high
6 school, and the alternative pathways education center to support the prevention of
7 youth vaping;
- 8 • Funding for evidence-based online courses that address student substance misuse
9 and other behavior issues. Modules cover alcohol, cannabis, prescription drugs, and
10 hazing, using interactive lessons and personalized feedback to promote real behavior
11 change. Beyond substance misuse, the program also addresses peer pressure, hazing,
12 and other negative behaviors, making it a versatile tool for prevention and response
13 to youth vaping;
- 14 • Development of a peer leadership program for at-risk students at the middle school
15 engaging students toward positive and healthy decision-making;
- 16 • The installation of security cameras on school property at all of their school
17 campuses, including six elementary schools, one middle school, one high school,
18 the technology center, and an alternative pathways education center. This allows
19 Rochester to monitor areas historically used for youth to vape;
- 20 • Installation of vape detectors at the high school that alert school staff to the use of
21 vaping products;
- 22 • Provision of two-way radios at all school campuses that allow staff to communicate
23 directly with the Rochester Police Department;
- 24 • Hiring a Director of Positive Youth and a Family and Community Engagement
25 Director, both of whom directly interact with youth on various aspects of emotional
26 well-being, including combatting vaping;
- 27 • Development of age-appropriate curricula for grades K-12 that build skills in
28 violence prevention, body safety, healthy relationships, consent, and more. Research

shows exposure to childhood trauma, including violence, places students at higher risk for substance misuse and mental-health challenges; so, these prevention programs support broader goals including reducing substance misuse such as vaping;

- Supporting the Mental Health Awareness Club at Rochester high school that fosters open communication and a support system for at-risk students, including through a stipend for the staff advisor; and
- Renovation of student recreation areas, including athletic fields, to support proactive student engagement in positive and pro-social activities shown to improve students' mental health, academic performance, and overall well-being.

5. Palm Beach County Schools, Florida

Bellwether Plaintiff Palm Beach County Schools is committed to a comprehensive and proactive approach to preventing and addressing substance use among students. PBCS has adopted the CDC's "Whole School, Whole Community, Whole Child" model recommended by Plaintiffs' abatement expert Dr. Steven Kelder, developed curricula specific to e-cigarettes, and presented at community events at libraries and school centers to educate parents and the boarder community about e-cigarettes. The district has mobilized settlement funds to educate students on the effects of using vapes and other tobacco products, to provide an education course to students in lieu of suspension for first and second tobacco offenses, and to provide an education course for teacher and non-instructional personnel to expand their understanding of vaping, tobacco, and other related products' effects on students.

Prevention education is also a core focus. Through the District's required curriculum, students receive age-appropriate instruction on substance use, addiction, brain development, and the skills needed to make healthy decisions. To reinforce these lessons, we partner with a wide range of community organizations that provide guest speakers and assemblies that highlight the real-world risks of vaping, nicotine addiction, and other substances. One such organization is Life Skills in Schools, which has provided vaping, marijuana, and alcohol prevention education to nearly 80,000 PBCS students during the 2024-25 school year. In addition, PBCS is currently piloting vape detectors in two middle and two high schools, a program aimed at reducing on-campus vaping and

1 improving early identification of concerning behaviors. The District will assess the use of vape
2 detectors throughout the pilot to make informed decisions regarding potential district-wide
3 implementation.

4 The District also offers an alternative-to-suspension program for students found in
5 possession of vapes or related products. This program emphasizes education, reflection, and
6 support rather than punitive consequences alone, helping students understand the risks associated
7 with vaping while connecting them with resources that promote healthier choices. In addition, the
8 District is developing a plan for students to develop marketing materials for educating other
9 students on the effects of vaping. The campaign will include scholarships as incentives and
10 produced videos will be used district-wide.

11 Equally important is the District's emphasis on addressing the underlying factors that can
12 lead students toward substance use. The District continues to expand mental health supports,
13 ensuring students have access to school counselors, behavioral health professionals, and trusted
14 adults who can help them navigate stress, anxiety, peer pressures, and other root causes. By
15 combining education, prevention, mental health support, restorative practices, and community
16 partnerships, we are building a coordinated and supportive system that promotes student safety,
17 well-being, and long-term healthy choices.

18 **6. Goddard School District, Kansas**

19 Bellwether Plaintiff USD 265 ("Goddard") has developed trainings for school staff to
20 recognize e-cigarettes and intervene to stop students from using them, created curriculum to educate
21 students and parents about the dangers of youth e-cigarette use, and collaborated with the Kansas
22 State Vaping Task Force. Goddard intends to use the settlement proceeds to continue addressing
23 student vaping and related at-risk behaviors.

24 Using the settlement funds, Goddard has expanded early childhood programs for students
25 and families and strengthened mental health support services for students. Both areas directly
26 support efforts to mitigate at-risk behaviors. This approach aligns with how the State of Kansas has
27 utilized tobacco settlement funds through the Children's Initiatives Fund, which focuses on early
28 childhood programming and the health and wellness of students. Goddard believes that a robust

early learning program combined with strong wellness supports at upper grade levels helps prevent students from engaging in destructive habits such as vaping and other forms of substance abuse.

Additionally, Goddard is presenting a pilot program for the Board of Education's consideration that will provide resources to help parents collaborate with the school and support their children when facing mental and physical health concerns, including vaping. Settlement funds will support this new initiative.

Since last year, the district has further expanded its efforts through several new initiatives:

- **Additional full-time school district police officer** dedicated to building positive relationships with students and parents. This officer has provided presentations to site councils on vaping and its impact on students and has contributed to expanded prevention education.
- **Reinstatement of the DARE program**, supported by this officer and the district's other school resource officers. Goddard successfully hosted its first DARE Summer Camp this past summer, with strong participation and positive outcomes.
- **Launch of ParentGuidance.org**, providing families with tools and support to navigate parenting challenges, including vaping. The district has seen a significant increase in parent engagement with this resource over the past year.
- **Expansion of early learning education**, supported by an Executive Director of Early Learning who oversees programming designed to broaden opportunities for families and strengthen early childhood development across the community.

Together, these initiatives further demonstrate Goddard's commitment to using settlement funds responsibly and strategically to support prevention, education, wellness, and long-term student success.

B. Other Exemplar Government Entity Plaintiffs

1. Los Angeles Unified School District, California

Los Angeles Unified School District ("LAUSD") has been working to address the problem of youth vaping and associated risky behaviors. For example, LAUSD has purchased and installed vape detectors for middle schools. The District is piloting these detectors in select middle schools,

1 addressing troubleshooting issues as they arise, and gathering data to expand the program if they
 2 are effective. The District then plans to use the data gathered from middle schools to implement
 3 learnings in high schools, as appropriate. It is also currently recruiting high schools to pilot vaping
 4 detection devices.

5 The District also is using funding to support its Beyond the Bell Tobacco-Use Prevention
 6 Education (TUPE) program, designed to prevent youth tobacco use by providing students with the
 7 knowledge and skills that enable them to be tobacco-free.² This program:

- 8 • Educates students about the dangers of tobacco use, empowering them to make
 9 informed decisions for their health;
- 10 • Integrates tobacco and cannabis prevention education with socio-emotional learning
 11 curriculum, teaching decision-making and peer resistance skills.
- 12 • Ensures all students have access to resources and support for their well-being,
 13 fostering an inclusive environment;
- 14 • Contributes to students' long-term health by preventing tobacco and cannabis use
 15 and its associated health risks;
- 16 • Empowers students to advocate for their health and well-being, promoting a sense
 17 of agency;
- 18 • Involves teachers, parents, and the community in tobacco prevention efforts and
 19 fosters a culture of wellness.
- 20 • Engages youth in leadership roles through AFHC Club and Peer Educators, boosting
 21 confidence and self-esteem;
- 22 • Promotes teamwork and cooperation among peers through group activities and
 23 discussions; and
- 24 • Empowers youth to make positive changes in their communities, fostering a sense
 25 of agency and civic engagement;

26 As part of the TUPE work, LAUSD organizes groups of students, including TUPE Peer
 27 Educators and Advocates for Health Choices (AFHC), who plan and conduct campus-wide

28 ² https://btb.lausd.org/apps/pages/index.jsp?uREC_ID=4356935&type=d&pREC_ID=2462643.

1 campaign events to educate their peers and the school community on the health risks associated
 2 with smoking and vaping tobacco and cannabis. TUPE Peer Educators are students in grades 6 - 12
 3 receive training as tobacco prevention peer educators. These students develop and facilitate
 4 presentations for their peers at their school sites. AFHC club members in grades 6 - 12 organize
 5 and conduct campaign events to spread information about the dangers of smoking and vaping and
 6 adopting healthy alternatives to smoking and vaping. The events take place throughout the year and
 7 usually align with a national event to reduce youth use of tobacco. The following are the campaign
 8 events that take place throughout the year:

- 9 • Red Ribbon Week (October)
- 10 • The Great American Smokeout/Escape the Vape (November)
- 11 • Save a Sweetheart/Healthy Hearts (February)
- 12 • Take Down Tobacco/Kick Butt's Day (March)
- 13 • Earth Day (April)
- 14 • World No Tobacco Day (May)

15 During the summer of 2025, LAUSD has hosted multiple student focus groups on substance
 16 abuse, including vaping. The district is currently working on focus groups with teachers and
 17 recruiting of the human centered design workshops in the health education classroom to begin the
 18 peer created interventions. The District is excited for this part to begin this Spring semester.

19 LAUSD has moved forward with purchasing the elementary one-to-one curriculum model,
 20 and is currently working on precuring training for middle school as well. The publisher of the
 21 curriculum has made final updates of the curriculum (and coaching model) and are now updating
 22 the training for LAUSD specifically.

23 Finally, LAUSD has been working on putting the pieces together for the Web portals,
 24 including a district Website portal for resources and a age-restricted student only Project U LA for
 25 teens. LAUSD spends significant time doing research on articles and videos for the repository of
 26 resources, and worked with students on this portion to find the most appropriate for the District's
 27 students. LAUSD has also been working to provide a more comprehensive list of campaign items
 28 for schools to select from. Across the board, LAUSD has been setting up school line items for

1 purchasing the supplemental campaign resources.

2 **2. Hillsborough County Public Schools, Florida**

3 Hillsborough County Public Schools (“HCPS”) has been using its settlement funding to
4 work to reducing and address vaping and tobacco use in the District. In Spring 2025, HCPS piloted
5 vape detection equipment at four high schools using three vendors. This work was led by HCPS
6 high school regional superintendents, who partnered closely with school leaders to monitor
7 implementation, review data, and gather feedback. Based on the results of the pilot, with proceeds
8 from the vaping litigation settlement, HCPS will move forward the selected vendor at scale for all
9 sites by Fall 2026. The vape detection system provides:

- 10 • Reliable detection of vaping and related air quality concerns in restrooms and other high-
- 11 risk areas
- 12 • Immediate alerts to administrators so they can intervene and support students in real time
- 13 • Robust data reporting that helps identify trends and high-need locations
- 14 • A consistent platform that can be implemented districtwide for training, monitoring, and
- 15 support

16 Next steps include finalizing site implementation schedules, coordinating installation, and
17 providing training for school-based staff.

18 **3. Miami-Dade School District, Florida**

19 Miami-Dade School District, in Miami-Dade County, Florida, has applied the Juul
20 settlement proceeds to install vaping monitoring equipment in over 500 schools throughout the
21 district and for related operational costs. Additionally, Miami-Dade is devoting resources from the
22 Juul settlement proceeds to provide mental health counseling to students throughout the district,
23 including to support students with substance use such as vaping.

24 **4. Blue Valley School District, Kansas**

25 Blue Valley School District in Kansa has applied the Juul settlement proceeds to train 10
26 Tobacco Treatment Specialist and 3 STaRT Certified (Support for Tobacco Recovery). As part of
27 this protocol established by the Tobacco Treatment Specialists, the District is now using the
28 Stanford Toolbox, recommended by expert Bonnie Halpern-Felsher, as a reduction for suspension

1 prevention education tool. They have created a My Quit Plan Packet for principals to share with
2 students and families that have a vaping infraction. The District has also used the funds to provide
3 a voucher for a free drug and alcohol screening for parents of students who have a vaping infraction.

4 In addition, the District has hosted an Influence Initiative where it collaborated with high
5 school students across the district to lead drug and alcohol prevention efforts across the district.
6 These high school students, supported by adults on the Drug and Alcohol Prevention Task Force
7 committee, will lead a social media campaign and also plan programming for the District's
8 community event. The District has also created prevention education posters for schools to use with
9 other prevention education tools in their campuses.

10 **5. Shawnee Mission School District, Kansas**

11 The Chief of Student and Family Services and the Coordinator of Health Services for
12 Shawnee Mission School District in Kansas have advised plaintiffs' counsel that it has utilized the
13 Juul settlement funds to hire a Student Wellness Specialist. She has increased connections with
14 secondary school administrators, school resource officers, counselors, social workers, teachers,
15 students, and families on vape/tobacco education initiatives.

16 In addition, at least one staff member in every secondary school has been trained to provide
17 vaping information and cessation support to interested students and their families. Recognizing that
18 the vape/tobacco use is typically linked to needs for mental health support, the District has also
19 provided Youth Mental Health First Aid training to additional adults in schools. Moreover,
20 presentations are being made to students and staff on vaping education and awareness, and
21 information booths are set up at secondary school cafeterias during lunch and at parent engagement
22 events. Finally, the District has developed an Alternatives to Suspension Course, which is being
23 used by students found with vape/tobacco as well as by students expressing interest in help to quit.

24 **6. The School District of Philadelphia, Pennsylvania**

25 The School District of Philadelphia ("SDP") has been working to promote tobacco and vape
26 free schools and using its settlement funds to address student tobacco/vaping education and related
27 student health issues. SDP has collaborated with the Philadelphia Department of Health to create
28 resources and provide guidance to students and families. SDP is using a tiered approach to vaping

1 prevention, connecting substance abuse and addiction programs with student support programs,
 2 such as Social Emotional Learning, Student Assistance Program, and Multi-Tiered Support
 3 Systems. SDP is working with substance abuse programs in the community and other prevention
 4 programs to provide services to students and families. This year, SDP also updated Board Policy
 5 222: Promoting Tobacco and Vape Free Schools.

6 This fall, SDP provided training to school counselors and climate staff on vaping
 7 prevention. SDP is using the Stanford Toolkit, recommended by MDL expert Dr. Halpern-Felsher,
 8 to provide an education course to students in lieu of suspension for violating SDP's vaping policy.
 9 SDP is educating students on the effects of using vapes, by, for example, distributing vaping
 10 prevention educational posters to every school and providing vaping prevention materials on its
 11 website. SDP has formed a Vaping Prevention Task Force, a partnership between the Office of
 12 Prevention & Intervention, Student Rights and Responsibilities, Family and Community
 13 Engagement, Student Health Services, and School Climate and Culture.

14 **C. Government Entities Are Also Benefiting From the Growing Body of**
 15 **Research and Resources to Address the Youth E-Cigarette Crisis**

16 MDL leadership also previously organized multiple educational presentations for
 17 participating government entities to hear from leading public health organizations and researchers
 18 and learn about resources available to combat youth vaping and educate students. Cumulatively,
 19 hundreds of representatives from settling government entities have attended these webinars and
 20 received expert information and advice about these resources.

21 These webinars featured presentations from leading public health organizations, including:
 22 The Truth Initiative[®], which began in 1998 with the Tobacco Master Settlement Agreement,
 23 (the foundation for the American Legacy Foundation, later renamed Truth Initiative) has developed
 24 curricula and research that can be rapidly adopted by the government entity plaintiffs. This
 25 organization has available resources for an anti-vaping curriculum including an online course about
 26 the dangers of using e-cigarettes, that was created by Truth Initiative[®] and Kaiser Permanente and
 27 in collaboration with the American Heart Association. This course has been found to significantly
 28 increase e-cigarette knowledge among middle and high school participants, according to a study

published in *Health Promotion Practice*.³ Similarly, a recent publication in the British Medical Journal⁴ found that “weekly campaign awareness demonstrate that exposure to the truth anti-e-cigarette campaign is associated with significantly lower odds of intentions to use and current use of e-cigarette among YYA [youth and young adults].”;

CATCH My Breath: CATCH My Breath is e-cigarette focused, is developmentally appropriate for elementary, middle, and high school students and has empirical findings of behavior change effectiveness in peer reviewed literature.⁵ The program has been recommended by the Substance Abuse and Mental Health Service Administration (SAMHSA⁶) and Community Anti-Drug Coalitions of America (CADCA⁷), two large national organizations devoted to reducing youth and young adult substance use in the U.S. (including tobacco and e-cigarettes).; and

Stanford REACH Lab: Stanford REACH Lab offers evidence-based curriculums and resources to prevent and reduce use of all tobacco/e-cigarette/nicotine products, all cannabis products, and all other drugs. These curriculums have been used by schools across the US and in many countries across the globe, and are developed to map onto national health education standards. Each interactive lesson includes teacher talking points (e.g., a script), activities, videos, and more. In particular, the Tobacco Prevention Toolkit is a free online and comprehensive resource on tobacco education, parent education and tobacco policies, including educational presentations

³ *Vaping curriculum by truth increases student knowledge about e-cigarettes*, Truth Initiative (Aug. 24, 2023), <https://truthinitiative.org/research-resources/tobacco-prevention-efforts/vaping-curriculum-truth-increases-student-knowledge>.

⁴ Hair EC, et al., *Reducing e-cigarette use among youth and young adults: evidence of the truth campaign’s impact*, Tobacco Control, British Medical Journal (Aug. 8, 2023), <https://tobaccocontrol.bmj.com/content/early/2023/08/08/tc-2023-057992>.

⁵ Kelder, S.H. et al. *Dissemination of CATCH My Breath, a middle school E-Cigarette prevention program*. Addictive Behav., vol. 113 (2021): 106698.

<https://pubmed.ncbi.nlm.nih.gov/33130463/>; Kelder, S.H. et al. *A Middle School Program to Prevent E-Cigarette Use: A Pilot Study of “CATCH My Breath”*. Pub. Health Rep., vol. 135,2 (2020): 220-229.

https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7036618/pdf/10.1177_0033354919900887.pdf.

⁶ SAMHSA report lists CATCH My Breath as only school-level youth vaping prevention program, CATCH Global Found. (May 27, 2021), <https://catch.org/samhsa-recommends-catch-my-breath/>.

⁷ *Coalitions in Action—Wolcott Citizens Against Substance Abuse’s “Catch My Breath”*

Initiative, CADCA, <https://www.cadca.org/resources/coalitions-action-wolcott-citizens-against-substance-abuses-catch-my-breath-initiative>.

1 on e-cigarettes. The toolkit demonstrated impact on knowledge of e-cigarette, perceptions, and
2 intent to try.⁸

3
4 Dated: December 17, 2025

Respectfully submitted,

5 By: /s/ Dean Kawamoto
Dean Kawamoto
6 **KELLER ROHRBACK L.L.P.**
1201 Third Ave., Ste. 3400
7 Seattle, WA 98101
Telephone: (206) 623-1900
8 dkawamoto@kellerrohrback.com

9 By: /s/ Dena C. Sharp
Dena C. Sharp
10 **GIRARD SHARP LLP**
601 California St., Suite 1400
11 San Francisco, CA 94108
Telephone: (415) 981-4800
12 dsharp@girardsharp.com

13 By: /s/ Sarah R. London
Sarah R. London
14 **GIRARD SHARP LLP**
601 California St., Suite 1400
15 San Francisco, CA 94108
Telephone: (415) 981-4800
16 slondon@girardsharp.com

17 By: /s/ Ellen Relkin
Ellen Relkin
18 **WEITZ & LUXENBERG**
700 Broadway
19 New York, NY 10003
Telephone: (212) 558-5500
20 erelkin@weitzlux.com

21 *Co-Lead Counsel for Plaintiffs*
22
23
24
25
26

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28 ⁸Gaiha, S.M. et al., *School-based e-cigarette education in Alabama: impact on knowledge of e-cigarettes, perceptions and intent to try*, Nat'l Ctr. For Biotechnology Info (2021), <https://pubmed.ncbi.nlm.nih.gov/32890911/>.

CERTIFICATE OF SERVICE

I hereby certify that on December 17, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

By: /s/ Dean Kawamoto
Dean Kawamoto